

Exhibit 39

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

WILHEN HILL BARRIENTOS, et al.,

Plaintiff,

v.

CORECIVIC, INC.,

Defendant.

REMOTE VIDEOCONFERENCE DEPOSITION OF
DROUDRED BLACKMON

Georgia

Thursday, October 14, 2021

9:00 a.m.

Reported by: Goldy Gold, RPR

Job No. 200481

1
2 Date: October 14, 2021

3 Time: 9:00 a.m.
4
5

6 REMOTE DEPOSITION OF DROUDRED

7 BLACKMON, taken by Counsel for Plaintiffs,
8 in the above-titled matter, on
9 October 14, 2021, commencing at 9:00 a.m.,
10 and reported by Goldy Gold, a Registered
11 Professional Reporter and a Notary Public
12 within and for the State of Maryland.
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A P P E A R A N C E S (appearing via Zoom):

On Behalf of the Plaintiffs:

BY: ALAN HOWARD, ESQUIRE
PERKINS COIE
1155 Avenue of the Americas
New York, New York 10036

On Behalf of the Defendant:

BY: JACOB LEE, ESQUIRE
STRUCK LOVE BOJANOWSKI & ACEDO
3100 West Way Road
Chandler, Arizona 85226

ALSO PRESENT (appearing via Zoom):

Vidhi Bamzai, SPLC
Meredith B. Stewart, SPLC
Rebecca M. Cassler, SPLC
Emily Cooper, Perkins Coie

1 D. BLACKMON

2 Q. Do you know what it said about the
3 case, if anything?

4 A. Actually, no, sir. It just said
5 don't -- don't destroy any documents.

6 Q. And you don't know when you got that
7 e-mail?

8 A. No, sir.

9 Q. What was your position at the time
10 you received that e-mail?

11 A. I was the chief of unit management.

12 Q. And do I understand you correctly,
13 you are no longer chief of unit management at the
14 Stewart Detention Center today?

15 A. That is correct.

16 Q. When did you leave that position?

17 A. In 2018 [audio distortion] --

18 MR. HOWARD: Hold on. We're getting
19 a lot of feedback. Mr. Blackmon, let me
20 stop you.

21 Mr. Blackmon, we lost your audio
22 there and you've frozen on the phone.
23 Now you're back?

24 THE WITNESS: Hello?

25 MR. HOWARD: Yeah, now it's better.

1 D. BLACKMON

2 Hopefully we won't have this all morning.

3 BY MR. HOWARD:

4 Q. But you said it was in 2018, and
5 then we lost you. So do you recall the month you
6 changed positions?

7 A. I want to say it was in November of
8 2018, I went chief of security. I did a lateral
9 transfer to chief of security.

10 Q. At Stewart Detention Center?

11 A. At Stewart. Yes, sir.

12 Q. Okay. And I'm going to use SDC --
13 "Steven-David-Charlie" -- as an abbreviation for
14 Stewart interchangeably.

15 Is that okay?

16 A. Yes, sir.

17 Q. And how long did you stay as chief
18 of security at SDC?

19 A. Until July the 1st, I was -- I
20 transferred to Jenkins Correctional Center.

21 Q. And this is July the 1st of this
22 year, 2021?

23 A. 2019.

24 Q. Oh, I'm sorry.

25 And what position did you take at

1 D. BLACKMON

2 A. Yes, sir.

3 Q. When you laterally transferred to
4 chief of security, did you then become
5 responsible for restricted housing?

6 A. Yes, sir.

7 Q. By the way, restricted housing, is
8 that also known as segregation?

9 A. Yes, sir.

10 Q. You also hear it referred to
11 informally as "the hole"?

12 MR. LEE: Object to form.

13 THE WITNESS: No, sir.

14 BY MR. HOWARD:

15 Q. You never saw that in any e-mails
16 you received or sent?

17 A. No. I don't recall that, sir.

18 Q. Do you recall any other names, other
19 than segregation or restricted housing, that were
20 applied to that unit?

21 A. That's it, sir.

22 Q. When you were chief of unit
23 management -- by the way, when did you get that
24 position at Stewart?

25 A. In 2011 or '12. Yeah, 2011.

1 D. BLACKMON

2 Q. Okay. And were you at -- were you a
3 CoreCivic employee before that?

4 A. Yes, sir.

5 Q. For how long?

6 A. I became a CoreCivic employee in
7 2006, on August the 14th.

8 Q. What position did you get?

9 A. When I came on, I was the shift
10 supervisor.

11 Q. Had you had any prior experience in
12 any detention or correctional facilities?

13 A. Yes, sir.

14 Q. Where were you coming from?

15 A. Calhoun State Prison.

16 Q. That is not a CoreCivic facility,
17 though, right?

18 A. No, sir.

19 Q. What was your job at Calhoun?

20 A. I started out as an officer. I
21 worked in security.

22 Q. Do you have educational training as
23 a security officer?

24 A. Excuse me?

25 Q. What training do you have as a

1 D. BLACKMON

2 Because you told me you joined -- you became head
3 of unit management in 2011 or 2012?

4 A. No.

5 Q. That -- that day must be wrong.

6 A. No, no, no. I joined CoreCivic in
7 2006, August the 14th.

8 Q. Okay. In what position?

9 A. As a shift supervisor.

10 Q. 2006, got it.

11 And then in 2011 -- what positions
12 did you have between 2006 and 2011 or '12 when
13 you became chief of unit management?

14 A. Well, shift supervisor first;
15 operation director, second; and then third,
16 assistant chief of security; and then finally the
17 chief of unit management.

18 Q. For what years were you assistant
19 chief of security?

20 A. 2009 to -- until May 2011.

21 Q. Now, I want to focus on the period
22 of time when you were chief of unit management.

23 You said one of your
24 responsibilities was overseeing unit managers.
25 What did that entail? Like, what were generally

1 D. BLACKMON

2 activities," and it includes the work programs,
3 right?

4 A. Yes.

5 Q. And it also includes, you know, food
6 service, number 7, right?

7 A. Yes.

8 Q. It also includes 10, discipline,
9 correct?

10 A. Yes.

11 MR. LEE: Object to form.

12 BY MR. HOWARD:

13 Q. So all of these things, 1 through
14 13, including work programs, including food
15 service, including discipline, the grievance
16 procedures and due process proceedings, those
17 apply equally across the board to all detainees
18 at Stewart Detention Center, correct?

19 A. Yes, sir.

20 Q. Now let's go to page 7. Kind of up
21 a little bit. There.

22 "Inspections of persons and
23 properties." The way I read this, routine
24 unscheduled searches of the facility, detainees'
25 persons and property, will be conducted as deemed

1 D. BLACKMON

2 CoreCivic hired off the street to come into the
3 facility and do jobs made a lot more than a
4 dollar to \$4 a day, right?

5 MR. LEE: Object to form.

6 THE WITNESS: Yes, sir.

7 BY MR. HOWARD:

8 Q. Do you think there was any benefit
9 to CoreCivic financially from having detainees do
10 jobs for a dollar to \$4 a day, that CoreCivic
11 would otherwise have to pay people a lot more
12 than that to do?

13 MR. LEE: Object to form and
14 foundation.

15 THE WITNESS: No. I think it is a
16 disadvantage.

17 BY MR. HOWARD:

18 Q. Disadvantage financially? Why?

19 A. Because if you brought someone in to
20 work, then the detainees wouldn't have money to
21 go to the commissary to buy the stuff they need,
22 according to the policy. They won't have that
23 money. So it was a -- it was a program designed
24 to actually put money in -- in an offender's -- I
25 mean -- I'm sorry -- a detainee's account, where

1 D. BLACKMON

2 he can go to the commissary and do those things
3 he wanted, buy or purchase phone calls so he can
4 talk to his family.

5 Q. Okay. So you're explaining to me
6 why having the work program available to
7 detainees would be a benefit to them: So they
8 can go to the commissary to buy things they
9 needed, like phone cards to talk to their family,
10 right?

11 A. Yes, sir.

12 Q. All right. But now I want to know,
13 was there also a financial benefit to CoreCivic
14 that these detainees were doing jobs that if the
15 detainees were not doing, you would need to hire
16 people and pay them a lot more than \$4 a day to
17 do those jobs?

18 MR. LEE: Object to form and
19 foundation.

20 THE WITNESS: I can't answer the
21 question for the company. I don't -- I
22 don't -- I don't see the money like that,
23 their -- their budget. I don't [audio
24 distortion] do with that.

25 BY MR. HOWARD:

1 CERTIFICATE OF REPORTER/NOTARY PUBLIC

2

3 I, Goldy Gold, a Notary Public within and
4 for the State of Maryland, do hereby certify that the
5 within-named witness personally appeared before me at
6 the time and place herein set out, and after having
7 been duly sworn by me, according to the law, was
8 examined by counsel.

9 I further certify that the examination was
10 recorded stenographically by me and this transcript
11 is a true record of the proceedings.

12 I further certify that I am not of counsel
13 to any of the parties, nor in any way interested in
14 the outcome of this action.

15 As witness my hand and notarial seal this
16 27th day of October, 2021.

17

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GOLDY GOLD, RPR

22

Notary Public

23

24 My Commission Expires: April 24, 2025

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